

ORIGINAL

SEP 30 2010

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISIONBy JAMES N. HARTEN, Clerk
Deputy Clerk

UNITED STATES OF AMERICA :
: CRIMINAL INFORMATION
v. :
: NO. 1:10-CR-425
A-440 PIANOS, INC., and :
PASCAL C. VIEILLARD :

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

On or about October 5, 2009, in the Northern District of Georgia, the defendant, A-440 PIANOS, INC., knowingly, willfully, and with intent to defraud the United States, did smuggle and clandestinely introduce, and attempt to smuggle and clandestinely introduce, into the United States merchandise, that is, elephant ivory, which should have been invoiced in accordance with Title 19, Code of Federal Regulations, Section 145.11(b), in violation of Title 18, United States Code, Section 545.

COUNT TWO

On or about October 5, 2009, in the Northern District of Georgia, the defendant, PASCAL C. VIEILLARD, did knowingly import wildlife, specifically, elephant ivory, when the defendant should have known in the exercise of due care that the elephant ivory had been imported in a manner unlawful under a federal regulation, specifically, Title 50, Code of Federal Regulations, Section 14.61, in that the wildlife was not reported and declared to officials of

the United States Fish and Wildlife Service, in violation of Title 16, United States Code, Sections 3372(a)(1) and 3373(d)(2).

FORFEITURE PROVISION

1. Upon conviction of the offense charged in Count One of this Information, the defendant, A-440 PIANOS, INC., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 545, any and all merchandise introduced into the United States in violation of Title 18, United States Code, Section 545, or the value thereof, including, but not limited to, the following:

855 elephant ivory key tops, totaling 1,710 individual pieces of elephant ivory.

2. Upon conviction of the offense charge in Count Two of this Information, the defendant, PASCAL C. VIEILLARD, shall forfeit to the United States, pursuant to Title 16, United States Code, Section 3374, as incorporated by Title 28, United States Code, Section 2461, any and all fish or wildlife or plant taken, possessed, transported, or sold in violation of any law, treaty, or

regulation of the United States, including, but not limited to, the following:

855 elephant ivory key tops, totaling 1,710 individual pieces of elephant ivory.

SALLY QUILLIAN YATES
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Mary C. Roemer', written over the printed name.

MARY C. ROEMER
ASSISTANT UNITED STATES ATTORNEY

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